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Proposed Counsel for Official
Committee of Unsecured Creditors of
Lehman Brothers Holdings Inc., et al.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
: :
LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)
: :
Debtors. : (Jointly Administered)
-----X

**MOTION UNDER LOCAL BANKRUPTCY RULE
2090-1(b) FOR ADMISSION PRO HAC VICE**

Dennis C. O'Donnell ("Movant"), a member in good standing of the Bar of the State of New York, an attorney admitted to practice before the United States Bankruptcy Court for the Southern District of New York and of counsel in the financial restructuring group of Milbank, Tweed, Hadley & M^cCloy LLP ("Milbank"), hereby submits this motion (the "Motion") to this Court for an order permitting Robert Jay Moore (the "Admittee") to practice pro hac vice before the United States Bankruptcy Court for the Southern District of New York to appear and represent the Official Committee of Unsecured Creditors (the "Committee") of Lehman Brothers Holdings Inc., and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), under Rule 2090-1(b) of the Local Bankruptcy Rules of the Southern District of New York. In support of the Motion, the Movant respectfully represents as follows:

1. Admittee is a partner of Milbank, resident in Milbank's Los Angeles office and is a member of Milbank's financial restructuring group. Admittee is admitted to practice and in good standing in the bars of the State of California, the District of Columbia (Inactive Status), the U.S. Court of Appeals for the Ninth Circuit, and the U.S. District Court for the (i) Central, (ii) Northern, (iii) Eastern, and (iv) Western Districts of California.

2. Pursuant to the annexed certification, the Admittee submits to the disciplinary jurisdiction of this Court for any alleged misconduct, which occurs in the course of, or in the preparation of, this action. In addition, Admittee has access to, or has acquired, a copy of the Local Rules and is generally familiar with such rules.

3. Admittee agrees to pay a fee of \$25 on entry of an order granting admission to practice pro hac vice.

4. Admittee's office and e-mail addresses, and telephone and fax numbers are as follows:

Robert Jay Moore
Milbank, Tweed, Hadley & McCloy LLP
601 South Figueroa Street, 30th Floor
Los Angeles, CA 90017
Telephone: (213) 892-4501
Facsimile: (213) 892-4701
rmoore@milbank.com

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WHEREFORE, the Movant respectfully requests that this Court enter and order permitting the Admittee to appear pro hac vice in association with the Movant as proposed counsel for the Committee in these chapter 11 cases.

Dated: New York, New York
October 17, 2008

MILBANK, TWEED, HADLEY & M^cCLOY LLP

By: /s/ Dennis C. O'Donnell

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Proposed Counsel for Official
Committee of Unsecured Creditors of
Lehman Brothers Holdings Inc., et al.

CERTIFICATION

The undersigned certifies that he is eligible for admission pro hac vice to this Court, is admitted to practice and in good standing in the bars of the State of California, the District of Columbia (Inactive Status), the U.S. Court of Appeals for the Ninth Circuit, and the U.S. District Court for the (i) Central, (ii) Northern, (iii) Eastern, and (iv) Western Districts of California, submits to the disciplinary jurisdiction of the Court for any alleged misconduct, which occurs in the course of, or in the preparation of, this action, and has access to, or has acquired, a copy of the Local Bankruptcy Rules for the Southern District of New York, and is generally familiar with such rules.

Dated: New York, New York
October 17, 2008

ROBERT JAY MOORE

A handwritten signature in blue ink, reading "Robert Jay Moore", is written over a horizontal line.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: :
LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)
: :
Debtors. : (Jointly Administered)
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**ORDER GRANTING MOTION UNDER LOCAL BANKRUPTCY
RULE 2090-1(b) FOR ADMISSION PRO HAC VICE**

ORDERED, that Robert Jay Moore, Esq., is admitted to practice pro hac
vice in the above-captioned chapter 11 cases, in the United States Bankruptcy Court for
the Southern District of New York, subject to payment of the filing fee.

Dated: New York, New York
October ____, 2008

THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE